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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

U.S. BANK N.A., SUCCESSOR
TRUSTEE TO BANK OF AMERICA,
N.A., SUCCESSOR IN INTEREST TO
LASALLE BANK N.A., ON BEHALF OF
THE REGISTERED HOLDERS OF BEAR
STEARNS ASSET BACKED
SECURITIES I LLC, ASSET-BACKED
CERTIFICATES, SERIES 2005-HE6,

Plaintiff,

vs.

TERRAFIRMA VENTURE LLC, a Nevada
corporation; TREASURES LANDSCAPE
MAINTENANCE ASSOCIATION, a
Nevada non-profit corporation,

Defendants.

CASE NO.: 2:17-cv-01890-JCM-NJK

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE RESPONSE
TO PLAINTIFF'S COMPLAINT**

(SECOND REQUEST)

Defendants TERRAFIRMA VENTURE LLC ("Terrafirma") and TREASURES LANDSCAPE MAINTENANCE ASSOCIATION ("HOA") (collectively, "Defendants"), and Plaintiff U.S. BANK N.A., SUCCESSOR TRUSTEE TO BANK OF AMERICA, N.A., SUCCESSOR IN INTEREST TO LASALLE BANK N.A., ON BEHALF OF THE REGISTERED HOLDERS OF BEAR STEARNS ASSET BACKED SECURITIES I LLC, ASSET-BACKED CERTIFICATES, SERIES 2005-HE6 ("Plaintiff" or "U.S. Bank"), by and through their respective counsel, hereby agree and stipulate as follows:

1. On July 10, 2017, Plaintiff filed a Complaint, ECF No. 1.

2. On October 25, 2017, the HOA and Plaintiff filed Stipulation and Order to Extend Time to File Response to Plaintiff's Complaint, and which was duly entered by the Court. ECF No. 12.
3. HOA's response to Plaintiff's Complaint is presently due on November 16, 2017.
4. Defendant Terrafirma's response to Plaintiff's Complaint is due on November 20, 2017.
5. Additional time is needed by the HOA counsel and Terrafirma's counsel to further evaluate Plaintiff's claims.
6. Plaintiff has agreed to provide both Defendants Terrafirma and HOA an extension of time up to and until November 27, 2017 within which to file their responses to Plaintiff's Complaint, which will result in both Defendants responding on the same day.
7. This is the second request for an extension of these deadlines.
8. This stipulation is made solely as the parties' way of accommodating one another and is not in any way intended for the purposes of prejudice or delay.

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For the above stated reasons, IT IS HEREBY AGREED AND STIPULATED, that the deadline for Terrafirma and HOA to respond to Plaintiff U.S. Bank's Complaint shall be extended to **November 27, 2017**.

DATED this 15th day of November, 2017. DATED this 15th day of November, 2017.

LIPSON, NEILSON, COLE, SELTZER & GARIN, P.C.

BALLARD SPAHR, LLP

By: /s/ Lisa J. Zastrow

By: /s/ Justin A. Shiroff

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Attorney for Plaintiff

DATED this 15th day of November, 2017.

BALL LAW GROUP

By: /s/ Zachary T. Ball

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*Attorneys for Defendant
Terrafirma Venture, LLC*

ORDER

IT IS SO ORDERED.

DATED: November 16, 2017.


UNITED STATES MAGISTRATE JUDGE

Submitted by:

LIPSON, NEILSON, COLE, SELTZER & GARIN, P.C.

By: /s/ Lisa J. Zastrow

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